

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

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**STANLEY NOLAN, II,**

**Plaintiff,**

**vs.**

**No.: 2:22-cv-2101**

**QUENTIN CAGE and  
BOASSO AMERICA CORPORATION,**

**Defendants.**

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**NOTICE OF REMOVAL OF CIVIL ACTION**

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TO: Steven Marshall  
Morgan & Morgan  
80 Monroe Avenue, Suite 900  
Memphis, TN 38103

Pursuant to 28 U.S.C. Sections 1441 and 1446, the Defendant, **Boasso America Corporation**, by and through its counsel of record, Glassman, Wyatt, Tuttle & Cox, P.C., files this Notice of Removal of the above civil action, and as basis for said removal, would show as follows:

1. Removing party, Boasso America Corporation, is a named Defendant in the above entitled action.
2. This matter was originally filed in the Circuit Court of Madison County, Tennessee, on or about January 24, 2022 under Docket No. C-22-17. A copy of the original Complaint filed in the Circuit Court of Madison County, Tennessee, is attached to this Notice of Removal.
3. Based on a review of the file by the undersigned counsel for removing Defendant,

- and checking with the Circuit Court Clerk of Madison County, the Summons and Complaint are the only pleadings filed in the cause to date.
4. The removing Defendant, Boasso America Corporation, is a Louisiana corporation, with its principal place of business being in Chalmette, Louisiana.
  5. Defendant, Quentin Cage, is a resident citizen of Baton Rouge, Louisiana, and at the time of the accident was an agent of Boasso America Corporation.
  6. Plaintiff. Stanley Nolan, II, is a resident citizen of Bartlett, Shelby County, Tennessee.
  7. Since the filing of the Complaint, the only further proceedings that have taken place in the Madison County, Tennessee Circuit Court action is a Notice of Acceptance of Service, affective February 17, 2022 on behalf of Boasso America Corporation.
  8. Based on the damages allegations in the Complaint, the amount in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00. Plaintiff has sued for \$1,500,000.00 and alleges various personal injury and resulting damages.
  9. This action is a civil action for personal injuries as a result of a motor vehicle accident which occurred on or about February 6, 2021, on I-40 in Madison County, Tennessee, near mile marker 86.
  10. This Court has original jurisdiction of this action pursuant to 28 U.S.C. Section 1332(a)(1) and (c) as the suit is between citizens of different states, and as the amount in controversy allegedly exceeds the sum of \$75,000.00 exclusive of interests and costs.
  11. Upon information and belief, the Defendant, Quentin Cage, has not been served with the Summons and Complaint as of this date. In the event he is served, the

undersigned counsel will be representing him, and as such, he will, upon service, join in and consent to this Removal.

12. This Notice of Removal is being filed with this Court within 30-days of the Acceptance of Service on behalf of the removing Defendant, Boasso America Corporation.

13. Defendant has filed a copy of this Notice of Removal with the Circuit Court of Madison County, Tennessee pursuant to 28 U.S.C. Section 1446 (d).

**RESPECTFULLY SUBMITTED,**

BY: s/Carl Wyatt

CARL WYATT, #12304

**Glassman, Wyatt, Tuttle & Cox, P.C.**

26 North Second Street

Memphis, Tennessee 38103

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GWTC File No. 21-109

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of February, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I, hereby certify that a true and correct copy of the foregoing pleading has been properly forwarded, via E-MAIL and/or U.S. Mail, to:

Steven Marshall  
80 Monroe Avenue, Suite 900  
Memphis, TN 38103

on this the 18<sup>th</sup> day of February, 2022.

s/Carl Wyatt

**CARL WYATT**